
**Information Collection Request
for
Title IV of the Public Health Security and Bioterrorism
Preparedness and Response Act of 2002:
Drinking Water Security and Safety**

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ACRONYMS

BLS	Bureau of Labor Statistics
CFR	Code of Federal Regulations
CWS	Community Water System
EPA	Environmental Protection Agency
ICR	Information Collection Request
ICW	Information Correction Worksheet
NAICS	North American Industry Classification System
O&M	Operation and Maintenance
OGWDW	Office of Ground Water and Drinking Water
OMB	Office of Management and Budget
PRA	Paperwork Reduction Act
PWS	Public Water System
RFA	Regulatory Flexibility Act
SBA	Small Business Administration
SBREFA	Small Business Regulatory Enforcement Fairness Act
SDWA	Safe Drinking Water Act
SIC	Standard Industrial Classification
SOC	Standard Occupational Classification

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Information Collection Request for Title IV of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002: Drinking Water Security and Safety

EPA Tracking Number: 2103.01

This Information Collection Request (ICR) details burden and cost estimates for reporting and recordkeeping activities required under the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188) (the Act). Specifically, this ICR addresses activities applicable to the United States Environmental Protection Agency (EPA or the Agency) and certain public water systems (PWSs) as required under Title IV of the Act, which addresses drinking water security and safety.

1(b) Short Characterization

Title IV of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188) amends the Safe Drinking Water Act (SDWA). (See Appendix A for Title IV of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002*.) The Act requires each community water system (CWS)¹ serving a population of more than 3,300 people to conduct a vulnerability assessment of its water system and to prepare or revise an emergency response plan that incorporates the results of the vulnerability assessment. To ensure proper compliance with the Act, EPA will collect and review the following items required to be submitted by CWSs on specified dates:

- Certification that the CWS conducted a vulnerability assessment.
- Copy of the vulnerability assessment.
- Certification that the CWS prepared or revised an emergency response plan.

EPA will also conduct compliance reviews of submitted vulnerability assessments.

To address the requirements under Title IV of the Act, EPA is providing baseline information to the CWSs required to conduct vulnerability assessments. EPA developed this information in consultation with other departments and agencies of the federal government and with state and local governments. Information is being provided on the kinds of terrorist attacks or other intentional acts that represent probable threats and that may substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water. EPA also consulted with federal law enforcement and intelligence officials to develop protocols necessary for protecting copies of the vulnerability assessments submitted and for ensuring security of the assessments and information contained in or derived from the assessments.

¹ A community water system is a PWS that serves at least 15 connections used by year-round residents or regularly serves at least 25 year-round residents.

Dependent on further Congressional appropriations, EPA may provide CWSs with financial or technical assistance for complying with the requirements of this Act. This work is not currently funded.

As explained in Section 2(a), this ICR estimates reporting and recordkeeping burden and costs to CWSs and EPA in response to Title IV of the Act. This ICR estimates burden and costs for calendar years 2003, 2004, and 2005.

For the three-year ICR period, the average annual respondent burden and cost to CWSs and EPA is estimated at 2,658,540 hours and \$157,078,665. The annual burden and cost to CWSs is estimated at 2,652,392 hours and \$156,540,365. The estimated annual EPA burden for this ICR is 6,148 hours, at an estimated annual cost of \$538,300.

EPA estimates that \$82,211 of the annual CWS costs will be spent on operation and maintenance (O&M) activities. These costs represent postage for delivery of certifications and copies of vulnerability assessments, as well as postage for delivery of certifications of emergency response plans. This \$82,211 represents the “cost burden” as reported in the official Office of Management and Budget (OMB) inventory. Note that these costs are for O&M only; there are no capital costs associated with the CWS activities covered by this ICR. EPA is estimated to incur \$166,667 in annual O&M costs for reimbursing training providers and for establishing proper security procedures for handling and storing vulnerability assessments. EPA is also estimated to incur \$16,667 in annual capital costs to complete security enhancements necessary to store and handle vulnerability assessments.

The total number of respondents for this ICR is 8,487; these respondents are all CWSs serving more than 3,300 people. The annual number of responses for these respondents is 22,499, which averages to 2.65 responses per respondent annually.

This ICR has been completed in accordance with the February 1999 version of *EPA’s Guide to Writing Information Collection Requests Under the Paperwork Reduction Act (PRA) of 1995* (hereafter, the “ICR Handbook”). The ICR Handbook was prepared by EPA’s Office of Environmental Information, Office of Information Collection, Collection Strategies Division. The ICR Handbook provides the most current instructions for ICR preparation to ensure compliance with the 1995 Paperwork Reduction Act Amendments and OMB’s implementing guidelines.

2 NEED FOR AND USE OF THE COLLECTION

2(a) Authority and Need for the Collection

EPA derives authority to collect this information from the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188). Through this Act, Congress conveyed the importance of protecting the nation's drinking water supply from intentional attack. The terrorist attacks of September 11, 2001, have resulted in a heightened awareness of the threat faced by the nation's citizens, its institutions, and its infrastructure. This includes the threat to the CWSs that supply the nation with safe drinking water. Congress mandated that CWSs assess their vulnerability to terrorist attacks and other intentional acts that would jeopardize a system's ability to ensure a safe and reliable supply of drinking water. To provide this security, systems must certify to the Agency that they have conducted these assessments and completed emergency response plans.

2(b) Use/Users of the Data

EPA will use the information collected under this ICR to determine whether CWSs have conducted vulnerability assessments and prepared emergency response plans in compliance with the Act. EPA will also use information submitted with the grant applications to provide federal financial assistance to CWSs for completing vulnerability assessments and emergency response plans and for complying with the Act.

Primary users of the information collected under this ICR include the EPA Office of Ground Water and Drinking Water (OGWDW), EPA Regional Administrators, and CWSs. Only entities designated by the Administrator may have access to the vulnerability assessments or information contained in or derived from the assessments (except as noted in Section 1433(a)(6)(A), 1433(a)(6)(B), and 1433(a)(7) of the Act).

3 NON-DUPLICATION, CONSULTATIONS AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

The information to be collected under this ICR is required by a new federal law. It does not duplicate any previous work. To the best of the Agency's knowledge, data requested to meet the requirements of the Act are not available from any other source.

The requested information will be prepared or compiled by CWSs. If CWSs have already developed emergency response plans, they are only required to update them with information from the vulnerability assessments that have not been developed or collected previously. Therefore, the information that EPA will collect is not unnecessarily duplicative of information otherwise available to the Agency.

3(b) Public Notice Required Prior to ICR Submission to OMB

To comply with the 1995 Amendments to the PRA, EPA solicited public comment on this ICR for a 10-day period before it was submitted to OMB.

3(c) Consultations

Because of the critical nature of the information to be collected under this ICR (i.e., ensuring safe and reliable drinking water), requirements for collection have been developed quickly. However, EPA has made an effort to consult with as many affected entities as possible within the limited time available. EPA worked closely with other federal agencies, state and local governments, CWSs, and industry organizations to ensure that the program developed is both effective and efficient. The Agency will continue to work closely with affected entities throughout further development and implementation of these requirements.

3(d) Effects of Less Frequent Collection

Only one response is required for each of three information categories (i.e., the vulnerability assessment, certification of the vulnerability assessment, and certification of the emergency response plan). These three items are mandated by Congress; to collect less often would be a failure to implement the law.

3(e) General Guidelines

This ICR was developed in accordance with the February 1999 version of the ICR Handbook prepared by EPA's Office of Environmental Information, Office of Information Collection, Collection Strategies Division. The ICR Handbook provides the most current instructions for ICR preparation to ensure compliance with the 1995 PRA amendments and OMB's implementing guidelines.

This collection does not violate any of the OMB guidelines for information collection activities. Specifically, the respondents are not required to:

- Report information to EPA more than quarterly.
- Prepare a written response to a collection of information in fewer than 30 days after receipt of a request.
- Submit more than an original and two copies of any document.
- Participate in a statistical survey that is not designed to produce data that can be generalized to the universe of the study.
- Use a statistical data classification that has not been reviewed and approved by OMB.

Though OMB guidelines state that respondents are not required to retain records, other than health, medical, government contract, grant-in-aid or tax records, for more than three years, this collection requires CWSs to retain copies of their emergency response plans for five years after certification by EPA. The authority to do so is stated directly from the Act: “each community water system shall maintain a copy of the emergency response plan completed pursuant to subsection (b) for 5 years after such plan has been certified to the Administrator under this section.” (Pub. L. 107-188, Sec. 1433(c))

3(f) Confidentiality

Because the Act requires collection of information that must remain confidential, CWSs will generally ship vulnerability assessments to EPA by courier service directly to a receiving location that secures the information, allowing access only by properly designated individuals. Each CWS is expected to retain a copy of its vulnerability assessment and emergency response plan in accordance with the recordkeeping requirements contained in the Act. EPA has enacted protocols to secure the vulnerability assessments upon receipt. Only individuals granted access by the EPA Administrator will have authorization to view the vulnerability assessments and any information derived from them (except as noted in Section 1433(a)(6)(A), 1433(a)(6)(B), and 1433(a)(7) of the Act).

3(g) Sensitive Questions

No questions of a sensitive nature are included in any of the information collection requirements outlined in this ICR.

4 RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS/SIC Codes

Data associated with this ICR are collected and maintained by EPA and by CWSs serving more than 3,300 persons. The North American Industry Classification System (NAICS) Code for investor-owned water systems is 22131; the Standard Industrial Classification (SIC) Code is 4941. The NAICS Code for publicly owned water systems is 92411; the SIC Code is 9511.

4(b) Information Requested

This ICR covers activities outlined by Title IV of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002*. This ICR summarizes information collection activities, data items, and respondent activities associated with Title IV of the Act.

4(b)(i) Data Items

Each CWS serving more than 3,300 people must conduct a vulnerability assessment of the water system, must certify to EPA that it has conducted this assessment, must revise an existing or prepare a new emergency response plan using the information obtained from the vulnerability assessment, and must certify the completion of this plan to EPA. CWSs may apply for financial assistance to complete the vulnerability assessment but must submit a grant application to do so.²

Title IV of the Act requires each CWS to submit the following to EPA:

- Copy of vulnerability assessment.
- Certification of vulnerability assessment conduct.
- Certification of completed emergency response plan.

Additionally, the Act requires each CWS to retain a copy of its emergency response plan for a minimum of five years. CWSs may also maintain records of other documents (e.g., copies of grant applications, vulnerability assessments, and certifications) as necessary.

² Currently, this ICR only includes descriptions of grant activities and unit burden and costs. If Congress appropriates funds for the grants, average annual burden and costs for grant applications and review will be added to the ICR through an Information Correction Worksheet (ICW). The appropriation will determine availability and funding levels for new grants.

4(b)(ii) Respondent Activities

Respondents for this information collection include community water systems serving more than 3,300 people. Because the Bioterrorism Act does not specify reporting or recordkeeping requirements for states, this ICR assumes no state activities associated with the Act. Each CWS is expected to complete the following activities to comply with Title IV of the Act:

- Read and understand the requirements.
- Complete vulnerability assessment training.
- Conduct an assessment of the vulnerability of the system to a terrorist attack or other intentional act intended to disrupt substantially the ability of the system to provide a safe and reliable supply of drinking water. This assessment should include (but is not limited to) a review of pipes and constructed conveyances; physical barriers; water collection, pretreatment, treatment, storage and distribution facilities; electronic, computer, or other automated systems which are utilized by the system; the use, storage, or handling of various chemicals; and the operation and maintenance of the system.
- Certify to EPA that the system has conducted a vulnerability assessment.
- Send the vulnerability assessment to EPA.
- Prepare or revise an emergency response plan that incorporates the results of the vulnerability assessment and includes (but is not limited to) plans, procedures, and identification of equipment that can be implemented or utilized in the event of a terrorist or other intentional attack on the public water system.
- Certify to EPA that the system has prepared or revised an emergency response plan.
- Maintain appropriate records as specified by the Act.

In addition, some CWSs may submit a grant application if funds become available.

5 INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA will conduct activities associated with this information collection to meet requirements of Title IV of the Act. These activities are listed below.

- Read and understand the Act.
- Review grant requests, if funding is appropriated.
- Provide vulnerability assessment training for CWSs.
- Review submitted vulnerability assessments for compliance with the Act.
- Review vulnerability assessment certifications for compliance with the Act.
- Review emergency response plan certifications.
- Maintain records as specified by the Act.

5(b) Collection Methodology and Management

In collecting the information associated with this ICR, EPA will use the U.S. Postal Service or overnight delivery services. CWSs should submit their vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications to EPA by courier service directly to a receiving location that secures the information. EPA must maintain information related to the vulnerability assessments in such a way as to monitor and limit access to authorized individuals. Access to the information must be limited to properly designated individuals as required by the Agency's Information Security Protocol.

EPA will ensure compliance with the Act by tracking the submission of vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications. EPA will review a statistically representative sample of the submitted vulnerability assessments to ensure that all applicable requirements of the Act are being met. In addition, EPA will review grant applications, as necessary.

5(c) Small Entity Flexibility

In developing this ICR for the requirements of the Act, EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include “small businesses,” “small organizations,” and “small government jurisdictions.” These terms are defined below.³

- A **small business** is any business that is independently owned and operated and not dominant in its field, as defined by the Small Business Administration (SBA) regulations under Section 3 of the Small Business Act.
- A **small organization** is any non-profit enterprise that is independently owned and operated and not dominant in its field.
- A **small governmental jurisdiction** is the government of a city, county, town, township, village, school district or special district that has a population of fewer than 50,000. This definition may also include Indian tribes.

The major requirement under SBREFA is a regulatory flexibility analysis of all rules that have a “significant economic impact on a substantial number of small entities.” Since EPA is not promulgating a rule, this ICR is not subject to SBREFA.

Considering the resources available to small CWSs, EPA is providing training for conducting vulnerability assessments and preparing emergency response plans. EPA will also provide financial assistance to CWSs, as funding is appropriated by Congress. However, EPA believes that the burden on small systems will be minimal. In addition, the Act is applicable only to CWSs serving more than 3,300 people. The smallest systems, consequently, are not affected by information collection activities covered in this ICR.

5(d) Collection Schedule

The schedule for this information collection is detailed below.

³ These definitions are taken from section 601 of the Regulatory Flexibility Act.

Vulnerability Assessments and Certifications

Community water systems must certify and submit to EPA copies of their vulnerability assessments prior to the following dates:

- March 31, 2003, for systems serving a population of 100,000 or more.
- December 31, 2003, for systems serving a population of 50,000 to 99,999 people.
- June 30, 2004, for systems serving a population greater than 3,300 but less than 50,000.

Emergency Response Plan Certifications

A community water system must certify to EPA that it has prepared or revised an emergency response plan by the earlier of the following deadlines:

- Within six months of certifying to EPA that the system has conducted a vulnerability assessment.
- Not later than six months after the statutory deadline for certifying to EPA that the system has conducted a vulnerability assessment. (March 31, 2003, for systems serving 100,000 or more people; December 31, 2003, for systems serving 50,000 to 99,999 people; and June 30, 2004, for systems serving 3,301 to 49,999 people).

Grant Applications

At its discretion and depending on available funding, EPA may develop additional grant programs to provide CWSs with financial assistance for conducting vulnerability assessments, preparing emergency response plans, and completing other activities to comply with the Act. Grant availability and funding levels have not yet been determined. If such programs are announced, CWSs may submit grant applications in accordance with guidelines established by EPA.

6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section describes the annual burden and costs for the information collection activities necessary to meet the requirements of Title IV of the Act. The burden and cost estimates for CWSs are discussed in detail in Section 6(a) and (b). The Agency's burden and cost estimates are outlined in Section 6(c). Because the Bioterrorism Act does not specify reporting or recordkeeping requirements for states, the states assume no burden or costs for activities associated with this ICR.

To the extent possible, estimates were based on consultations with individuals who have already prepared vulnerability assessments and emergency response plans. EPA emphasizes that the per-respondent estimates represent the *average* burden and cost over the three-year period covered by this ICR (2003 through 2005). Some respondents will incur higher (sometimes significantly higher) costs and some will fall below the average (e.g., some very large systems, which represent a small fraction of the total number of systems, may spend over one million dollars on their vulnerability assessments). Detailed burden and cost estimates for CWSs and EPA are provided in Exhibits 1, 2, and 3, as well as in Appendix B.

6(a) Respondent Burden

The average annual respondent burden for CWSs is summarized in Exhibit 1. Appendix B provides detail of the annual estimated respondent burden for CWSs to complete the activities described in section 4(b)(ii). EPA estimates a total average annual respondent burden of 2,652,392 hours for complying with the requirements of Title IV of the Act. This estimate includes burden hours associated with reading and understanding Title IV of the Act, preparing grant applications (if authorized), completing training, conducting vulnerability assessments, certifying the conduct of vulnerability assessments, preparing or revising emergency response plans, certifying the conduct of emergency response plans, and recordkeeping. The derivation of each estimate is described below.

Reading and Understanding Requirements

The estimate for the CWS burden to read and understand the Act's requirements is 8 hours per system. This is the total burden per system required for multiple key personnel to read and understand the requirements. EPA based this estimate on its experience with systems reading and understanding requirements of similar complexity.

Preparing Grant Applications

The estimate for the CWS burden to prepare a grant application is 40 hours per system⁴. EPA based this estimate on its knowledge of the burden associated with previously administered grant programs.

Training

For staff training, EPA estimated that CWSs serving 3,301 to 49,999 people will require 8 hours, and CWSs serving 50,000 or more people will require 48 hours. The Agency based these estimates on preliminary consultations with CWSs and EPA Regional personnel.

Conducting Vulnerability Assessments

The burden associated with conducting vulnerability assessments is estimated based on system size, with burdens ranging from 85 hours (for the smallest systems required to fulfill the Act's provisions) to 6,794 hours (for the largest CWSs). EPA based its estimates for vulnerability assessment burden on preliminary consultations with CWSs and EPA Regional personnel and on information from previous grant applications.

Certifying Conduct of Vulnerability Assessments

EPA estimated that CWSs will require 2 hours to prepare a vulnerability assessment certification, based on the Agency's experience with similar certification requirements.

Preparing or Revising Emergency Response Plans

The estimate for the CWS burden to prepare an emergency response plan is 42 hours for systems serving 3,301 to 9,999 people, 213 hours for systems serving 10,000 to 49,999 people, and 255 hours for systems serving populations of 50,000 or greater. To revise an emergency response plan, the Agency estimated the burden at 28 hours for systems serving 3,301 to 9,999 people, 100 hours for systems serving 10,000 to 49,999 people, and 120 hours for systems serving populations of 50,000 or greater. The Agency used a three-step process to arrive at these estimates. First, based on its consultations with CWSs and EPA Regional personnel, EPA estimated the burden required both to prepare and to revise an emergency response plan. It then estimated the percentage of these plans related specifically to the security of the system

⁴ Currently, this ICR only includes descriptions of grant activities and unit burden and costs. If Congress appropriates funds for the grants, average annual burden and costs for grant applications and review will be added to the ICR through an Information Correction Worksheet (ICW). The appropriation will determine availability and funding levels for new grants.

preparing the plan. Finally, multiplying the estimated unit burden for preparing or revising an emergency response plan by the percentage of the plan related to security yielded the estimated unit burden for emergency response plans under the Act.

Certifying the Completion of Emergency Response Plans

EPA estimates that CWSs will require 2 hours to prepare an emergency response plan certification, based on the Agency's experience with similar certification requirements.

Recordkeeping

EPA estimates the CWS burden for recordkeeping to be 0.25 hours per record kept, based on the Agency's experience with maintaining records.

6(b) Respondent Costs

Exhibit 1 shows the annual average costs for CWSs over the three-year ICR period. CWS labor costs are estimated by applying an hourly labor rate to the burden hour estimates (as explained in 6(a) above). For purposes of calculating CWS labor costs, EPA assumed a single average hourly wage rate of \$58.88. The rate is derived from the rate quoted by the Bureau of Labor Statistics (BLS) for Standard Occupational Classification (SOC) code 11-1021 (General and Operations Managers).⁵ EPA estimates that CWSs will incur an average annual labor cost of \$156,458,154 for these requirements. Appendix B provides detailed cost calculations for the information collection activities covered by this ICR.

CWSs incur no capital costs associated with this ICR. CWSs are estimated to incur O&M costs (\$82,211 annually) to cover postage for submitting grant applications (when authorized), vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications. Given the sensitive nature of these materials, EPA assumed that each CWS will submit the required information by certified, return-receipt mail or courier service at a cost of \$25.21 to ship the vulnerability assessment and associated certification and \$3.85 to ship the certification of emergency response plan completion.

⁵ The quoted rate was \$33.76 in year 2000 dollars (see <http://stats.bls.gov>). For accuracy, this rate has been adjusted for inflation to 2002 dollars using the Employment Cost Index for Electric, Gas, and Sanitary Services (3Q 2002: 167.2; 4Q 2000: 153.4). The rate in 2002 dollars is \$36.80. In addition, 60 percent overhead was assumed, bringing the loaded rate to \$58.88 in 2002 dollars.

Exhibit 1
Average Annual Community Water System Burden and Costs

Activity	Responses	Burden Hours ¹	Labor Costs	O&M Costs	Total Annual Costs
Read/Understand Act	2,829	22,632	\$1,332,466	\$0	\$1,332,466
Grant Requests	0	0	\$0	\$0	\$0
Training	2,696	27,901	\$1,642,700	\$0	\$1,642,700
Develop Vulnerability Assessment	2,829	2,330,125	\$137,484,607	\$0	\$137,484,607
Certification of Assessment	2,829	5,658	\$333,117	\$71,319	\$404,436
Prepare Emergency Response Plan	1,635	167,909	\$9,885,710	\$0	\$9,885,710
Revise Emergency Response Plan	1,195	91,093	\$5,363,158	\$0	\$5,363,158
Certification of Emergency Response Plan	2,829	5,658	\$333,117	\$10,892	\$344,009
Recordkeeping	5,658	1,415	\$83,279	\$0	\$83,279
Total	22,499	2,652,392	\$156,458,154	\$82,211	\$156,540,365

Notes: Detail may not add exactly to total due to independent rounding.

¹ Hours reflect an annual average for all system sizes over the three-year ICR period.

6(c) Agency Burden and Costs

To implement Title IV of the Act, EPA will incur burden and costs. Cost and burden estimates for EPA's activities associated with the Act are detailed in Exhibit 2 and Appendix B. For the three-year ICR period, EPA estimated that the average annual burden to the Agency will be 6,148 hours. This estimate includes burden incurred by EPA staff for the activities outlined in Section 5(a) above. The derivation of these burden hours follows.

Reading and Understanding Requirements

Given previous experience with regulations similar complexity, EPA estimated that its staff will require 40 hours to read and understand the requirements of Title IV of the Act. This estimate assumed that several key staff members will read the requirements.

Reviewing Grant Applications

The estimate for the Agency's burden to review a grant application varies by system size: 20 hours to review applications from systems serving 3,301 to 49,999 people and 40 hours to review applications from systems serving populations of 50,000 or greater⁶. EPA based this estimate on its experience with previously administered grant programs.

Training

EPA estimated a 40-hour burden for selecting and administering contractors to train CWSs for preparing vulnerability assessments and emergency response plans. EPA derived this estimate from previous, similar outsourcing of system training.

Reviewing Vulnerability Assessments and Certifications

As stated in Section 5, EPA will ensure compliance with the Act by tracking the submission of vulnerability assessments and certifications of vulnerability assessment conduct. EPA will review a statistically representative sample of the submitted vulnerability assessments to ensure that all applicable requirements of the Act are being met. Based on EPA's recent experience with vulnerability assessments, the Agency has estimated an average review time for each CWS size category as follows:

- 0.6 hours for systems serving 3,301 to 49,999 people.
- 1.1 hours for systems serving 50,000 to 99,999 people.
- 1.3 hours for systems serving 100,000 or more people.

These estimates are weighted averages based on the anticipated review time and the number of reviews that EPA will conduct.

⁶ Currently, this ICR only includes descriptions of grant activities and unit burden and costs. If Congress appropriates funds for the grants, average annual burden and costs for grant applications and review will be added to the ICR through an Information Correction Worksheet (ICW). The appropriation will determine availability and funding levels for new grants.

Reviewing Emergency Response Plan Certifications

EPA estimated that it will incur 0.25 hours of burden to review each certification of emergency response plan completion. EPA based this estimate on its experience reviewing certifications for other EPA-administered programs.

Recordkeeping

To both file and secure the records required by Title IV of the Act, EPA estimated that it will incur a 0.25-hour burden for each record and an additional 2,080 hours annually for security. The Agency estimated this burden based on its experience with maintaining similar records. The annual security burden is for one staff member devoted full-time to security of those records.

For the 6,148 burden hours, EPA will incur annual labor costs of \$354,966 to implement the Act's requirements. The following assumptions were used to develop a cost estimate for EPA activities associated with Title IV of the Act:

- The average salary and benefits for EPA staff is at the GS 13, Step 5 level of \$120,093.⁷
- There are 2,080 hours per person-year.
- The average hourly rate is \$57.74.

EPA also incurs \$166,667 in annual O&M costs for providing vulnerability assessment development training to CWSs. This estimate begins with the assumption that each contractor hired to provide training will cost \$50,000. Assuming ten trainers (roughly one for each Region), this amounts to \$500,000 over the three-year ICR period. Although EPA may distribute grant monies should they be authorized by Congress, availability and funding for new grants have not yet been determined.

In addition to the labor costs incurred for these activities, EPA cost estimates include the cost of security enhancements designed to protect contents of the vulnerability assessments. These are considered capital costs, which are estimated at \$16,667 annually.

⁷ According to the Office of Personnel Management 2002 GS Pay Schedule, the GS-13 Step 5 salary is \$75,058. By adding the standard government benefits factor of 1.6, the average salary plus benefits is \$120,093.

Exhibit 2
Average Annual Agency Burden and Costs

Activity	Burden Hours ¹	Labor Costs	O&M Costs	Capital Costs	Total Annual Costs
Read/Understand Requirements	13	\$770	\$0	\$0	\$770
Review Grant Requests	0	\$0	\$0	\$0	\$0
Training	133	\$7,698	\$166,667	\$0	\$174,365
Review Vulnerability Assessments and Certifications	1,800	\$103,902	\$0	\$0	\$103,902
Review Emergency Response Plan Certifications	707	\$40,834	\$0	\$0	\$40,834
Recordkeeping	3,495	\$201,762	\$0	\$16,667	\$218,429
Total	6,148	\$354,966	\$166,667	\$16,667	\$538,300

Note: Detail may not add exactly to total due to independent rounding.

¹ Hours reflect an annual average for all system sizes over the three-year ICR period.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The only respondents for this ICR are CWSs serving populations of more than 3,300 people. This ICR estimates the number of such CWSs at 8,487. The total costs and burden for these respondents are summarized in Exhibit 1. Agency costs and burden are detailed in Section 6(c) and in Exhibit 2.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden hours and costs appear in Exhibit 3⁸. The total annual average respondent burden associated with this ICR is estimated to be 2,652,392 burden hours. The corresponding total annual average respondent costs are estimated to be \$156,540,365. The total national burden, including respondent burden and EPA burden, is estimated to be 2,658,540 hours annually. The total national cost, for respondents and EPA, is estimated to be \$157,078,665 annually, with \$156,813,120 in annual labor costs, \$248,878 in O&M costs, and \$16,667 in capital costs.

⁸ See Appendix B for detailed derivations of these burden and cost estimates.

Exhibit 3
Bottom Line Average Annual Burden and Costs

Number of Respondents	8,487	Community water systems
Total Annual Responses	22,499	Community water system responses
Number of Responses per Respondent	$2.65 = 22,499 / 8,487$	Total annual responses from above Total respondents from above
Total Annual Respondent Burden Hours	2,652,392	Community water system hours
Hours per Response	$117.9 = 2,652,392 / 22,499$	Total annual hours from above Total responses from above
Annual O&M Costs⁹	\$82,211	Community water system O&M costs
Total Annual Respondent Cost	\$156,540,365	Community water systems costs
Total Annual Hours (respondent plus Agency)	$2,658,540 = 2,652,392 + 6,148$	Total respondent hours Total EPA hours
Total Annual Cost (respondent plus Agency)	$\$157,078,665 = \$156,540,365 + \$538,300$	Total respondent cost Total EPA cost

Note: Detail may not add exactly to total due to independent rounding.

6(f) Reasons For Change In Burden

Since this is the initial ICR for a new requirement, this ICR does not modify an existing ICR and thus does not change existing burden.

6(g) Burden Statement

The public reporting burden for collections included in this ICR is detailed in Exhibit 3 above. The annual respondent burden is estimated to average 117.9 hours per respondent per year, which is attributed to CWSs. This estimate includes time for reading and understanding the requirements, completing training, conducting a vulnerability assessment, certifying that the vulnerability assessment was conducted, preparing or revising an emergency response plan, certifying the completion of an emergency response plan, and maintaining the required records.

⁹ This represents the “cost burden” as reported in the OMB inventory. Note that there are no CWS capital costs associated with this ICR.

Burden means the total time, effort, or financial resources expended by people to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology, and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a request for information collection unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OW-2003-0013, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the room is (202) 566-1744, and the telephone number for the Water Docket is (202) 566-2426. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, to access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. (OW-2003-0013) in any correspondence.

Appendix A

Title IV of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002: Drinking Water Security and Safety

TITLE IV—DRINKING WATER SECURITY AND SAFETY

SEC. 401. TERRORIST AND OTHER INTENTIONAL ACTS.

The Safe Drinking Water Act (title XIV of the Public Health Service Act) is amended by inserting the following new section after section 1432:

42 USC 300i-2.

“SEC. 1433. TERRORIST AND OTHER INTENTIONAL ACTS.

Deadline.

“(a) **VULNERABILITY ASSESSMENTS.**—(1) Each community water system serving a population of greater than 3,300 persons shall conduct an assessment of the vulnerability of its system to a terrorist attack or other intentional acts intended to substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water. The vulnerability assessment shall include, but not be limited to, a review of pipes and constructed conveyances, physical barriers, water collection, pretreatment, treatment, storage and distribution facilities, electronic, computer or other automated systems which are utilized by the public water system, the use, storage, or handling of various chemicals, and the operation and maintenance of such system. The Administrator, not later than August 1, 2002, after consultation with appropriate departments and agencies of the Federal Government and with State and local governments, shall provide baseline information to community water systems required to conduct vulnerability assessments regarding which kinds of terrorist attacks or other intentional acts are the probable threats to—

“(A) substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water; or

“(B) otherwise present significant public health concerns.

Certification.
Deadlines.

“(2) Each community water system referred to in paragraph (1) shall certify to the Administrator that the system has conducted an assessment complying with paragraph (1) and shall submit to the Administrator a written copy of the assessment. Such certification and submission shall be made prior to:

“(A) March 31, 2003, in the case of systems serving a population of 100,000 or more.

“(B) December 31, 2003, in the case of systems serving a population of 50,000 or more but less than 100,000.

“(C) June 30, 2004, in the case of systems serving a population greater than 3,300 but less than 50,000.

“(3) Except for information contained in a certification under this subsection identifying the system submitting the certification and the date of the certification, all information provided to the Administrator under this subsection and all information derived therefrom shall be exempt from disclosure under section 552 of title 5 of the United States Code.

“(4) No community water system shall be required under State or local law to provide an assessment described in this section to any State, regional, or local governmental entity solely by reason of the requirement set forth in paragraph (2) that the system submit such assessment to the Administrator.

Deadlines.
Protocols.

“(5) Not later than November 30, 2002, the Administrator, in consultation with appropriate Federal law enforcement and intelligence officials, shall develop such protocols as may be necessary to protect the copies of the assessments required to be submitted

under this subsection (and the information contained therein) from unauthorized disclosure. Such protocols shall ensure that—

“(A) each copy of such assessment, and all information contained in or derived from the assessment, is kept in a secure location;

“(B) only individuals designated by the Administrator may have access to the copies of the assessments; and

“(C) no copy of an assessment, or part of an assessment, or information contained in or derived from an assessment shall be available to anyone other than an individual designated by the Administrator.

At the earliest possible time prior to November 30, 2002, the Administrator shall complete the development of such protocols for the purpose of having them in place prior to receiving any vulnerability assessments from community water systems under this subsection.

“(6)(A) Except as provided in subparagraph (B), any individual referred to in paragraph (5)(B) who acquires the assessment submitted under paragraph (2), or any reproduction of such assessment, or any information derived from such assessment, and who knowingly or recklessly reveals such assessment, reproduction, or information other than—

“(i) to an individual designated by the Administrator under paragraph (5),

“(ii) for purposes of section 1445 or for actions under section 1431, or

“(iii) for use in any administrative or judicial proceeding to impose a penalty for failure to comply with this section, shall upon conviction be imprisoned for not more than one year or fined in accordance with the provisions of chapter 227 of title 18, United States Code, applicable to class A misdemeanors, or both, and shall be removed from Federal office or employment.

“(B) Notwithstanding subparagraph (A), an individual referred to in paragraph (5)(B) who is an officer or employee of the United States may discuss the contents of a vulnerability assessment submitted under this section with a State or local official.

“(7) Nothing in this section authorizes any person to withhold any information from Congress or from any committee or subcommittee of Congress.

“(b) EMERGENCY RESPONSE PLAN.—Each community water system serving a population greater than 3,300 shall prepare or revise, where necessary, an emergency response plan that incorporates the results of vulnerability assessments that have been completed. Each such community water system shall certify to the Administrator, as soon as reasonably possible after the enactment of this section, but not later than 6 months after the completion of the vulnerability assessment under subsection (a), that the system has completed such plan. The emergency response plan shall include, but not be limited to, plans, procedures, and identification of equipment that can be implemented or utilized in the event of a terrorist or other intentional attack on the public water system. The emergency response plan shall also include actions, procedures, and identification of equipment which can obviate or significantly lessen the impact of terrorist attacks or other intentional actions on the public health and the safety and supply of drinking water provided to communities and individuals. Community water systems

Certification.
Deadline.

shall, to the extent possible, coordinate with existing Local Emergency Planning Committees established under the Emergency Planning and Community Right-to-Know Act (42 U.S.C. 11001 et seq.) when preparing or revising an emergency response plan under this subsection.

“(c) RECORD MAINTENANCE.—Each community water system shall maintain a copy of the emergency response plan completed pursuant to subsection (b) for 5 years after such plan has been certified to the Administrator under this section.

“(d) GUIDANCE TO SMALL PUBLIC WATER SYSTEMS.—The Administrator shall provide guidance to community water systems serving a population of less than 3,300 persons on how to conduct vulnerability assessments, prepare emergency response plans, and address threats from terrorist attacks or other intentional actions designed to disrupt the provision of safe drinking water or significantly affect the public health or significantly affect the safety or supply of drinking water provided to communities and individuals.

“(e) FUNDING.—(1) There are authorized to be appropriated to carry out this section not more than \$160,000,000 for the fiscal year 2002 and such sums as may be necessary for the fiscal years 2003 through 2005.

“(2) The Administrator, in coordination with State and local governments, may use funds made available under paragraph (1) to provide financial assistance to community water systems for purposes of compliance with the requirements of subsections (a) and (b) and to community water systems for expenses and contracts designed to address basic security enhancements of critical importance and significant threats to public health and the supply of drinking water as determined by a vulnerability assessment conducted under subsection (a). Such basic security enhancements may include, but shall not be limited to the following:

“(A) the purchase and installation of equipment for detection of intruders;

“(B) the purchase and installation of fencing, gating, lighting, or security cameras;

“(C) the tamper-proofing of manhole covers, fire hydrants, and valve boxes;

“(D) the rekeying of doors and locks;

“(E) improvements to electronic, computer, or other automated systems and remote security systems;

“(F) participation in training programs, and the purchase of training manuals and guidance materials, relating to security against terrorist attacks;

“(G) improvements in the use, storage, or handling of various chemicals; and

“(H) security screening of employees or contractor support services.

Funding under this subsection for basic security enhancements shall not include expenditures for personnel costs, or monitoring, operation, or maintenance of facilities, equipment, or systems.

“(3) The Administrator may use not more than \$5,000,000 from the funds made available under paragraph (1) to make grants to community water systems to assist in responding to and alleviating any vulnerability to a terrorist attack or other intentional acts intended to substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water (including

sources of water for such systems) which the Administrator determines to present an immediate and urgent security need.

“(4) The Administrator may use not more than \$5,000,000 from the funds made available under paragraph (1) to make grants to community water systems serving a population of less than 3,300 persons for activities and projects undertaken in accordance with the guidance provided to such systems under subsection (d).

SEC. 402. OTHER SAFE DRINKING WATER ACT AMENDMENTS.

The Safe Drinking Water Act (title XIV of the Public Health Service Act) is amended by inserting the following new sections after section 1433 (as added by section 401 of this Act):

“SEC. 1434. CONTAMINANT PREVENTION, DETECTION AND RESPONSE. 42 USC 300i-3.

“(a) **IN GENERAL.**—The Administrator, in consultation with the Centers for Disease Control and, after consultation with appropriate departments and agencies of the Federal Government and with State and local governments, shall review (or enter into contracts or cooperative agreements to provide for a review of) current and future methods to prevent, detect and respond to the intentional introduction of chemical, biological or radiological contaminants into community water systems and source water for community water systems, including each of the following:

Contracts.

“(1) Methods, means and equipment, including real time monitoring systems, designed to monitor and detect various levels of chemical, biological, and radiological contaminants or indicators of contaminants and reduce the likelihood that such contaminants can be successfully introduced into public water systems and source water intended to be used for drinking water.

“(2) Methods and means to provide sufficient notice to operators of public water systems, and individuals served by such systems, of the introduction of chemical, biological or radiological contaminants and the possible effect of such introduction on public health and the safety and supply of drinking water.

“(3) Methods and means for developing educational and awareness programs for community water systems.

“(4) Procedures and equipment necessary to prevent the flow of contaminated drinking water to individuals served by public water systems.

“(5) Methods, means, and equipment which could negate or mitigate deleterious effects on public health and the safety and supply caused by the introduction of contaminants into water intended to be used for drinking water, including an examination of the effectiveness of various drinking water technologies in removing, inactivating, or neutralizing biological, chemical, and radiological contaminants.

“(6) Biomedical research into the short-term and long-term impact on public health of various chemical, biological and radiological contaminants that may be introduced into public water systems through terrorist or other intentional acts.

“(b) **FUNDING.**—For the authorization of appropriations to carry out this section, see section 1435(e).

42 USC 300i-4.

“SEC. 1435. SUPPLY DISRUPTION PREVENTION, DETECTION AND RESPONSE.

Contracts.

“(a) **DISRUPTION OF SUPPLY OR SAFETY.**—The Administrator, in coordination with the appropriate departments and agencies of the Federal Government, shall review (or enter into contracts or cooperative agreements to provide for a review of) methods and means by which terrorists or other individuals or groups could disrupt the supply of safe drinking water or take other actions against water collection, pretreatment, treatment, storage and distribution facilities which could render such water significantly less safe for human consumption, including each of the following:

“(1) Methods and means by which pipes and other constructed conveyances utilized in public water systems could be destroyed or otherwise prevented from providing adequate supplies of drinking water meeting applicable public health standards.

“(2) Methods and means by which collection, pretreatment, treatment, storage and distribution facilities utilized or used in connection with public water systems and collection and pretreatment storage facilities used in connection with public water systems could be destroyed or otherwise prevented from providing adequate supplies of drinking water meeting applicable public health standards.

“(3) Methods and means by which pipes, constructed conveyances, collection, pretreatment, treatment, storage and distribution systems that are utilized in connection with public water systems could be altered or affected so as to be subject to cross-contamination of drinking water supplies.

“(4) Methods and means by which pipes, constructed conveyances, collection, pretreatment, treatment, storage and distribution systems that are utilized in connection with public water systems could be reasonably protected from terrorist attacks or other acts intended to disrupt the supply or affect the safety of drinking water.

“(5) Methods and means by which information systems, including process controls and supervisory control and data acquisition and cyber systems at community water systems could be disrupted by terrorists or other groups.

“(b) **ALTERNATIVE SOURCES.**—The review under this section shall also include a review of the methods and means by which alternative supplies of drinking water could be provided in the event of the destruction, impairment or contamination of public water systems.

“(c) **REQUIREMENTS AND CONSIDERATIONS.**—In carrying out this section and section 1434—

“(1) the Administrator shall ensure that reviews carried out under this section reflect the needs of community water systems of various sizes and various geographic areas of the United States; and

“(2) the Administrator may consider the vulnerability of, or potential for forced interruption of service for, a region or service area, including community water systems that provide service to the National Capital area.

“(d) **INFORMATION SHARING.**—As soon as practicable after reviews carried out under this section or section 1434 have been evaluated, the Administrator shall disseminate, as appropriate as determined by the Administrator, to community water systems

information on the results of the project through the Information Sharing and Analysis Center, or other appropriate means.

“(e) FUNDING.—There are authorized to be appropriated to carry out this section and section 1434 not more than \$15,000,000 for the fiscal year 2002 and such sums as may be necessary for the fiscal years 2003 through 2005.”.

SEC. 403. MISCELLANEOUS AND TECHNICAL AMENDMENTS.

The Safe Drinking Water Act is amended as follows:

(1) Section 1414(i)(1) is amended by inserting “1433” after “1417”. 42 USC 300g–3.

(2) Section 1431 is amended by inserting in the first sentence after “drinking water” the following: “, or that there is a threatened or potential terrorist attack (or other intentional act designed to disrupt the provision of safe drinking water or to impact adversely the safety of drinking water supplied to communities and individuals), which”. 42 USC 300i.

(3) Section 1432 is amended as follows: 42 USC 300i–1.

(A) By striking “5 years” in subsection (a) and inserting “20 years”.

(B) By striking “3 years” in subsection (b) and inserting “10 years”.

(C) By striking “\$50,000” in subsection (c) and inserting “\$1,000,000”.

(D) By striking “\$20,000” in subsection (c) and inserting “\$100,000”.

(4) Section 1442 is amended as follows: 42 USC 300j–1.

(A) By striking “this subparagraph” in subsection (b) and inserting “this subsection”.

(B) By amending subsection (d) to read as follows:

“(d) There are authorized to be appropriated to carry out subsection (b) not more than \$35,000,000 for the fiscal year 2002 and such sums as may be necessary for each fiscal year thereafter.”. Appropriation authorization.

TITLE V—ADDITIONAL PROVISIONS

Subtitle A—Prescription Drug User Fees

SEC. 501. SHORT TITLE.

This subtitle may be cited as the “Prescription Drug User Fee Amendments of 2002”.

Prescription
Drug User Fee
Amendments of
2002.
21 USC 301 note.

SEC. 502. FINDINGS.

The Congress finds that—

(1) prompt approval of safe and effective new drugs and other therapies is critical to the improvement of the public health so that patients may enjoy the benefits provided by these therapies to treat and prevent illness and disease;

(2) the public health will be served by making additional funds available for the purpose of augmenting the resources of the Food and Drug Administration that are devoted to the process for the review of human drug applications and the assurance of drug safety;

(3) the provisions added by the Prescription Drug User Fee Act of 1992, as amended by the Food and Drug Administration Modernization Act of 1997, have been successful in

21 USC 379g
note.

Appendix B

Burden and Cost Tables

Exhibit B.1 CWS Inventory

System Size Category (Population Served)	Ground Water CWSs	Surface Water CWSs	Wholesale CWSs	All CWSs
	A	B	C	C=A+B+C
3,301-9,999	2,567	1,971	38	4,576
10,000-49,999	1,256	1,729	52	3,037
50,000-99,999	140	322	13	475
≥100,000	62	300	37	399
Totals	4,025	4,322	140	8,487

Source: SDWIS FY 2002 Quarter 3 frozen database. Active CWSs in the current inventory only.

Exhibit B.2 CWS Unit Cost Assumptions

Activities	Assumptions				
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost	Unit Capital Cost
	A	B	C=A*B	D	E
Read and Understand Requirements					
- Systems Serving 3,301-9,999	8	\$ 58.88	\$ 471.00	\$ -	\$ -
- Systems Serving 10,000-49,999	8	\$ 58.88	\$ 471.00	\$ -	\$ -
- Systems Serving 50,000-99,999	8	\$ 58.88	\$ 471.00	\$ -	\$ -
- Systems Serving ≥100,000	8	\$ 58.88	\$ 471.00	\$ -	\$ -
Grant Requests (Note 1)					
- Systems Serving 3,301-9,999	40	\$ 58.88	\$ 2,355.01	\$ 3.85	\$ -
- Systems Serving 10,000-49,999	40	\$ 58.88	\$ 2,355.01	\$ 3.85	\$ -
- Systems Serving 50,000-99,999	40	\$ 58.88	\$ 2,355.01	\$ 3.85	\$ -
- Systems Serving ≥100,000	40	\$ 58.88	\$ 2,355.01	\$ 3.85	\$ -
Training					
- Systems Serving 3,301-9,999	8	\$ 58.88	\$ 471.00	\$ -	\$ -
- Systems Serving 10,000-49,999	8	\$ 58.88	\$ 471.00	\$ -	\$ -
- Systems Serving 50,000-99,999	48	\$ 58.88	\$ 2,826.02	\$ -	\$ -
- Systems Serving ≥100,000	48	\$ 58.88	\$ 2,826.02	\$ -	\$ -
Develop Vulnerability Assessments					
- Systems Serving 3,301-9,999	84.9	\$ 58.88	\$ 5,000.00	\$ -	\$ -
- Systems Serving 10,000-49,999	1,273.9	\$ 58.88	\$ 75,000.00	\$ -	\$ -
- Systems Serving 50,000-99,999	1,698.5	\$ 58.88	\$ 100,000.00	\$ -	\$ -
- Systems Serving ≥100,000	6,794.0	\$ 58.88	\$ 400,000.00	\$ -	\$ -
Certify Vulnerability Assessments Developed and Submit Copy to EPA					
- Systems Serving 3,301-9,999	2	\$ 58.88	\$ 117.75	\$ 25.21	\$ -
- Systems Serving 10,000-49,999	2	\$ 58.88	\$ 117.75	\$ 25.21	\$ -
- Systems Serving 50,000-99,999	2	\$ 58.88	\$ 117.75	\$ 25.21	\$ -
- Systems Serving ≥100,000	2	\$ 58.88	\$ 117.75	\$ 25.21	\$ -
Prepare Emergency Response Plans					
- Systems Serving 3,301-9,999	42	\$ 58.88	\$ 2,472.76	\$ -	\$ -
- Systems Serving 10,000-49,999	213	\$ 58.88	\$ 12,511.01	\$ -	\$ -
- Systems Serving 50,000-99,999	255	\$ 58.88	\$ 15,013.21	\$ -	\$ -
- Systems Serving ≥100,000	255	\$ 58.88	\$ 15,013.21	\$ -	\$ -
Revise Emergency Response Plans					
- Systems Serving 3,301-9,999	28	\$ 58.88	\$ 1,648.51	\$ -	\$ -
- Systems Serving 10,000-49,999	100	\$ 58.88	\$ 5,887.53	\$ -	\$ -
- Systems Serving 50,000-99,999	120	\$ 58.88	\$ 7,065.04	\$ -	\$ -
- Systems Serving ≥100,000	120	\$ 58.88	\$ 7,065.04	\$ -	\$ -
Certify Emergency Response Plans Prepared or Revised					
- Systems Serving 3,301-9,999	2	\$ 58.88	\$ 117.75	\$ 3.85	\$ -
- Systems Serving 10,000-49,999	2	\$ 58.88	\$ 117.75	\$ 3.85	\$ -
- Systems Serving 50,000-99,999	2	\$ 58.88	\$ 117.75	\$ 3.85	\$ -
- Systems Serving ≥100,000	2	\$ 58.88	\$ 117.75	\$ 3.85	\$ -
Recordkeeping					
- Systems Serving 3,301-9,999	0.25	\$ 58.88	\$ 14.72	\$ -	\$ -
- Systems Serving 10,000-49,999	0.25	\$ 58.88	\$ 14.72	\$ -	\$ -
- Systems Serving 50,000-99,999	0.25	\$ 58.88	\$ 14.72	\$ -	\$ -
- Systems Serving ≥100,000	0.25	\$ 58.88	\$ 14.72	\$ -	\$ -

Note 1: Availability and funding levels for new grants have not yet been determined.

Exhibit B.3 EPA Unit Cost Assumptions

Activities	Assumptions				
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost	Unit Capital Cost
	A	B	C=A*B	D	E
Read and Understand Requirements	40	\$ 57.74	\$ 2,309.48	\$ -	\$ -
Review Grant Requests (Note 1)					
- Systems Serving 3,301-9,999	20	\$ 57.74	\$ 1,154.74	(Note 1)	\$ -
- Systems Serving 10,000-49,999	20	\$ 57.74	\$ 1,154.74	(Note 1)	\$ -
- Systems Serving 50,000-99,999	40	\$ 57.74	\$ 2,309.48	(Note 1)	\$ -
- Systems Serving ≥100,000	40	\$ 57.74	\$ 2,309.48	(Note 1)	\$ -
Training	40	\$ 57.74	\$ 2,309.48	\$ 50,000.00	\$ -
Review Vulnerability Assessments and Certifications					
- Systems Serving 3,301-9,999	0.6	\$ 57.74	\$ 33.20	\$ -	\$ -
- Systems Serving 10,000-49,999	0.6	\$ 57.74	\$ 33.20	\$ -	\$ -
- Systems Serving 50,000-99,999	1.1	\$ 57.74	\$ 63.51	\$ -	\$ -
- Systems Serving ≥100,000	1.3	\$ 57.74	\$ 72.17	\$ -	\$ -
Review Emergency Response Plan Certifications					
- Systems Serving 3,301-9,999	0.25	\$ 57.74	\$ 14.43	\$ -	\$ -
- Systems Serving 10,000-49,999	0.25	\$ 57.74	\$ 14.43	\$ -	\$ -
- Systems Serving 50,000-99,999	0.25	\$ 57.74	\$ 14.43	\$ -	\$ -
- Systems Serving ≥100,000	0.25	\$ 57.74	\$ 14.43	\$ -	\$ -
Recordkeeping					
- Filing	0.25	\$ 57.74	\$ 14.43	\$ -	\$ -
- Security	2,080	\$ 57.74	\$ 120,092.80	\$ -	\$ 50,000.00

Note 1: Availability and funding levels for new grants have not yet been determined.

Exhibit B.4 CWS Yearly Responses, Burden, and Costs

Activities	CWS Responses by Year			CWS Burden by Year			CWS Labor Cost by Year			CWS O&M Cost by Year			CWS Capital Cost by Year		
	2003	2004	2005	2003	2004	2005	2003	2004	2005	2003	2004	2005	2003	2004	2005
Read and Understand Requirements															
- Systems Serving 3,301-9,999	4,576	-	-	36,608	-	-	\$ 2,155,308	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	3,037	-	-	24,296	-	-	\$ 1,430,435	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	-	-	3,800	-	-	\$ 223,726	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	-	-	3,192	-	-	\$ 187,930	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Requests (Note 1)															
- Systems Serving 3,301-9,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Training															
- Systems Serving 3,301-9,999	4,576	-	-	36,608	-	-	\$ 2,155,308	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	3,037	-	-	24,296	-	-	\$ 1,430,435	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	-	-	22,800	-	-	\$ 1,342,357	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Vulnerability Assessments															
- Systems Serving 3,301-9,999	-	4,576	-	-	388,618	-	\$ -	\$ 22,880,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	3,037	-	-	3,868,768	-	\$ -	\$ 227,775,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	-	-	806,790	-	-	\$ 47,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000 (Note 2)	399	-	-	1,926,199	-	-	\$ 114,298,822	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Certify Vulnerability Assessments Developed and Submit Copy to EPA															
- Systems Serving 3,301-9,999	-	4,576	-	-	9,152	-	\$ -	\$ 538,827	\$ -	\$ -	\$ 115,361	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	3,037	-	-	6,074	-	\$ -	\$ 357,609	\$ -	\$ -	\$ 76,563	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	-	-	950	-	-	\$ 55,932	\$ -	\$ -	\$ 11,975	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	-	-	798	-	-	\$ 46,983	\$ -	\$ -	\$ 10,059	\$ -	\$ -	\$ -	\$ -	\$ -
Prepare Emergency Response Plans															
- Systems Serving 3,301-9,999	-	3,203	-	-	134,534	-	\$ -	\$ 7,920,757	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	1,519	-	-	322,681	-	\$ -	\$ 18,997,964	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	143	-	-	36,338	-	\$ -	\$ 2,139,382	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	40	-	-	10,175	-	-	\$ 599,027	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Revise Emergency Response Plans															
- Systems Serving 3,301-9,999	-	1,373	-	-	38,438	-	\$ -	\$ 2,263,073	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	1,519	-	-	151,850	-	\$ -	\$ 8,940,218	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	333	-	-	39,900	-	\$ -	\$ 2,349,126	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	359	-	-	43,092	-	-	\$ 2,537,056	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Certify Emergency Response Plans Prepared or Revised															
- Systems Serving 3,301-9,999	-	4,576	-	-	9,152	-	\$ -	\$ 538,827	\$ -	\$ -	\$ 17,618	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	3,037	-	-	6,074	-	\$ -	\$ 357,609	\$ -	\$ -	\$ 11,692	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	475	-	-	950	-	\$ -	\$ 55,932	\$ -	\$ -	\$ 1,829	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	-	-	798	-	-	\$ 46,983	\$ -	\$ -	\$ 1,536	\$ -	\$ -	\$ -	\$ -	\$ -
Recordkeeping															
- Systems Serving 3,301-9,999	-	9,152	-	-	2,288	-	\$ -	\$ 134,707	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	6,074	-	-	1,519	-	\$ -	\$ 89,402	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	475	-	119	119	-	\$ 6,991	\$ 6,991	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	798	-	-	200	-	-	\$ 11,746	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total - All Activities	20,394	47,103	-	2,940,720	5,016,455	-	\$ 174,029,038	\$ 295,345,424	\$ -	\$ 23,570	\$ 223,063	\$ -	\$ -	\$ -	\$ -

Note 1: Availability and funding levels for new grants have not yet been determined.

Note 2: CWS burden and labor costs are offset by the amount of grant money previously awarded by EPA to perform vulnerability assessments.

Exhibit B.5 EPA Yearly Responses, Burden, and Costs

Activities	EPA Responses by Year			EPA Burden by Year			EPA Labor Cost by Year			EPA O&M Cost by Year			EPA Capital Cost by Year		
	2003	2004	2005	2003	2004	2005	2003	2004	2005	2003	2004	2005	2003	2004	2005
Read and Understand Requirements	1	-	-	40	-	-	\$ 2,309	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grant Requests (Note 1)															
- Systems Serving 3,301-9,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Training	10	-	-	400	-	-	\$ 23,095	\$ -	\$ -	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ -
Review Vulnerability Assessments and Certifications															
- Systems Serving 3,301-9,999	-	4,576	-	-	2,631	-	\$ -	\$ 151,917	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	3,037	-	-	1,746	-	\$ -	\$ 100,825	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	475	-	-	523	-	\$ -	\$ 30,168	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	-	-	499	-	-	\$ 28,796	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Emergency Response Plan Certifications															
- Systems Serving 3,301-9,999	-	-	4,576	-	-	1,144	\$ -	\$ -	\$ 66,051	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	-	-	3,037	-	-	759	\$ -	\$ -	\$ 43,837	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	-	475	-	-	119	-	\$ -	\$ 6,856	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	-	-	100	-	-	\$ 5,759	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Recordkeeping															
- Filing	798	8,563	7,613	200	2,141	1,903	\$ 11,519	\$ 123,600	\$ 109,888	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Security	1	1	1	2,080	2,080	2,080	\$ 120,093	\$ 120,093	\$ 120,093	\$ -	\$ -	\$ -	\$ 50,000	\$ -	\$ -
Total - All Activities	1,608	17,127	15,227	3,318	9,239	5,887	\$ 191,571	\$ 533,459	\$ 339,868	\$ 500,000	\$ -	\$ -	\$ 50,000	\$ -	\$ -

Note 1: Availability and funding levels for new grants have not yet been determined.

Exhibit B.6 Respondent, Responses, Burden, and Cost Summaries

Respondent	Respondents	Annual Response Estimates			Average Annual Responses	Annual Burden Estimates			Average Annual Burden
		2003	2004	2005		2003	2004	2005	
CWSs									
- Systems Serving 3,301-9,999	4,576	9,152	27,456	-	12,202.7	73,216	582,183	-	218,466
- Systems Serving 10,000-49,999	3,037	6,074	18,222	-	8,098.7	48,592	4,356,966	-	1,468,519
- Systems Serving 50,000-99,999	475	2,375	1,425	-	1,266.7	834,458	77,306	-	303,922
- Systems Serving >100,000	399	2,793	-	-	931.0	1,984,453	-	-	661,484
CWS Total	8,487	20,394	47,103	-	22,499.0	2,940,720	5,016,455	-	2,652,392
EPA	1	1,608	17,127	15,227	11,320.7	3,318	9,239	5,887	6,148

Respondent	Respondents	Annual Labor Cost			Average Annual Labor Cost	Annual O&M (Cost Burden) Estimates			Average Annual O&M (Cost Burden)
		2003	2004	2005		2003	2004	2005	
CWSs									
- Systems Serving 3,301-9,999	4,576	\$ 4,310,616	\$ 34,276,191	\$ -	\$ 12,862,269	\$ -	\$ 132,979	\$ -	\$ 44,326
- Systems Serving 10,000-49,999	3,037	\$ 2,860,870	\$ 256,517,802	\$ -	\$ 86,459,557	\$ -	\$ 88,255	\$ -	\$ 29,418
- Systems Serving 50,000-99,999	475	\$ 49,129,007	\$ 4,551,431	\$ -	\$ 17,893,479	\$ 11,975	\$ 1,829	\$ -	\$ 4,601
- Systems Serving >100,000	399	\$ 117,728,545	\$ -	\$ -	\$ 39,242,848	\$ 11,595	\$ -	\$ -	\$ 3,865
CWS Total	8,487	\$ 174,029,038	\$ 295,345,424	\$ -	\$ 156,458,154	\$ 23,570	\$ 223,063	\$ -	\$ 82,211
EPA	1	\$ 191,571	\$ 533,459	\$ 339,868	\$ 354,966	\$ 500,000	\$ -	\$ -	\$ 166,667

Respondent	Respondents	Annual Capital Cost			Average Annual Capital Cost
		2003	2004	2005	
CWSs					
- Systems Serving 3,301-9,999	4,576	\$ -	\$ -	\$ -	\$ -
- Systems Serving 10,000-49,999	3,037	\$ -	\$ -	\$ -	\$ -
- Systems Serving 50,000-99,999	475	\$ -	\$ -	\$ -	\$ -
- Systems Serving >100,000	399	\$ -	\$ -	\$ -	\$ -
CWS Total	8,487	\$ -	\$ -	\$ -	\$ -
EPA	1	\$ 50,000	\$ -	\$ -	\$ 16,667

Respondent	Respondents	Annual Responses per Respondent			Annual Cost per Respondent		
		2003	2004	2005	2003	2004	2005
CWSs							
- Systems Serving 3,301-9,999	4,576	2	6	-	\$ 942	\$ 7,519	\$ -
- Systems Serving 10,000-49,999	3,037	2	6	-	\$ 942	\$ 84,493	\$ -
- Systems Serving 50,000-99,999	475	5	3	-	\$ 103,455	\$ 9,586	\$ -
- Systems Serving >100,000	399	7	-	-	\$ 295,088	\$ -	\$ -
CWS Total	8,487	2	6	-	\$ 20,508	\$ 34,826	\$ -
EPA	1	1,608	17,127	15,227	\$ 691,571	\$ 533,459	\$ 339,868